CONTINGENCY PLAN

BELL LUMBER & POLE COMPANY
PLANT OPERATIONS
NEW BRIGHTON, MINNESOTA

Prepared by:
Conestoga-Rovers & Associates

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NOVEMBER 2010
REF. NO. 005480 (38)

CONTINGENCY PLAN
BELL LUMBER & POLE COMPANY

REVISION LOG

DATE	REVISION	TECHNICAL CHANGE (YES/NO)	SIGNATURE

CONTINGENCY PLAN
BELL LUMBER & POLE COMPANY

DISTRIBUTION LIST

- Plant Managers Office
- Water Treatment Lab
- Plant Personnel Lunch Room
- Plant Maintenance Office
- Safety and Quality Control Office

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1.0 INTRODUCTION

The Bell Lumber and Pole Company (BLP) wood treating facility is located at 778 First Street Northwest in New Brighton, Minnesota (Site). Industrial activities at the Site are classified under SIC 2491. Wood treating activities began at the Site in 1919. Since 1952, a fuel oil type carrier P-9 has been used as a wood preservative. The typical mixture of pentachlorophenol (PCP) in these solutions is approximately five to six percent.

The Site is 26.3 total acres. Approximately 1.2 acres of the Site is used for office and parking lots, where no industrial activities occur. Currently 25.1 acres of the Site is used for industrial activities. The Site location is shown on Figure 1.1. A Site plan is shown on Figure 1.2.

Wastes produced by BLP operations include treating tank filter cake, personal protective equipment (PPE), treated wood waste and contaminated soil. Much of this waste is classified as a hazardous waste under waste code F032 related to process residuals, preservative drippage, and spent formulations from wood preserving processes generated at plants that currently use or have previously used chlorophenolic formulations.

Due to the amount of hazardous waste generated, BLP operates as a Large Quantity Hazardous Waste Generator (LQG) under EPA ID Number MND006206403. As such, BLP is required to maintain a Contingency Plan in accordance with 40 CFR 265.50 through 265.56 and Minnesota Rules 7045.0566 through 7045.0576. This Plan has been prepared to satisfy these requirements. Specifically, this Plan contains the following:

Section 2 – Emergency Coordinator and Emergency Telephone Numbers

Section 3 – Hazardous Wastes Generated On Site

Section 4 – Emergency Response Procedures

Section 5 – Arrangements with Local Emergency Response Services

Section 6 – Release-Prevention Measures

Section 7 – Emergency Equipment

Section 8 – Evacuation Plan

2.0 EMERGENCY COORDINATOR AND EMERGENCY TELEPHONE NUMBERS

The designated primary person accountable for emergency response and release prevention at the facility is Rick Bleskey, Midwest Operations Coordinator. He can be reached at 651-633-4334 (office) or 612-270-9760 (cell). Brian Hamilton (651-633-4335) or Brian Stepaniak (651-633-4336) will serve as alternate Emergency Coordinators in Mr. Bleskey's absence. Below is the contact information for these people.

Primary Emergency Coordinator - Rick Bleskey
Office: (651) 633-4334
Cell: (612) 270-9760

Home address
Non-releasble

Work address
Bell Lumber and Pole Company
778 First Street Northwest
New Brighton, Minnesota 55112

Alternative Emergency Coordinator - Brian Hamilton
Office: (651) 633-4335
Cell: (715) 651-7463

Home address
Non-releasble

Work address
Bell Lumber and Pole Company
778 First Street Northwest
New Brighton, Minnesota 55112

Alternative Emergency Coordinator - Brian Stepaniak
Office: (651) 633-4336
Cell: (651) 470-5008

Home address
Non-releasble

Work address
Bell Lumber and Pole Company
778 First Street Northwest
New Brighton, Minnesota 55112

Appendix A provides a list of additional Emergency Contact Telephone Numbers.

3.0 HAZARDOUS WASTES GENERATED ON SITE

Hazardous wastes generated at the Site are all related to process residuals, preservative drippage, and spent formulations from wood preserving processes that currently include cresol (D026), pentrachlorophenol (D037/F032), wastewater (F032), and storage tank bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol (K001). In 2009, approximately 21,500 pounds of F032 waste was generated at the Site. The maximum amount of stored hazardous waste is 11,000 pounds. Hazardous waste is stored inside DOT approved 55-gallon drums in the Wood Treatment Building as shown in Figure 3.1 and at a satellite accumulation area in the Water Treatment Building as shown in Figure 3.2.

4.0 EMERGENCY RESPONSE PROCEDURES

A small spill occurring at the storage point would be contained using sorbent materials located at the respective building. Large indoor spills would be contained by the secondary barrier then pumped from the sump found in each area for disposal. Outdoor spills would be contained using sorbent material and by the construction of a temporary berm if necessary.

If spilled hazardous waste is discharged from the Facility, a contractor will be mobilized and regulatory agencies notified. A list of BLP contact personnel, state and federal emergency numbers and contract services is provided in Appendix A. The hazardous waste stored at the BLP Facility is non-corrosive material and are compatible with the materials with which the storage containers and containment structures at the Facility are constructed.

For any spill, the potential fire, electrical, or other health hazard shall be immediately evaluated. If the situation appears dangerous, the area should be evacuated and the Fire Department/Police Department (911) notified. In the Wood Treatment Building, the telephone is located in the control room. Water Treatment Building telephones are located in the break room (upstairs) or the Maintenance Shop (downstairs). Supervisory Personnel are also equipped with 2-way radios linked to the main office.

If the situation does not appear to be dangerous, then immediate steps shall be taken to control or minimize the spill as required.

Once immediate measures have been taken, the supervisor and/or people listed on the Emergency Contact List (Appendix A) shall be contacted to obtain additional help. The most senior supervisor on the scene has authority to contact outside help as required and expend the funds to control the situation.

In the event of a hazardous waste spill (e.g., container leakage or drum failure) at the Facility, the following general response procedures should be observed. Specific response procedures will be determined by the nature of the spill event and will be directed by the Facility Manager or his designee, in part, based upon established Facility emergency response procedures.

1. Stop the source of the spill
    - Set the container upright or the leak side up

- Stop transfer

2. Obstruct flow of spill
   - Small spills – Use available absorbent materials.
   - Large spills – Use absorbent materials to block building doorways for a spill within a building. Construct temporary berms or other barriers with available materials for an outdoor spill.
3. Isolate the spill from potential stormwater contact and verify no off site release.
4. Immediately notify the Emergency Coordinator (see Section 2.0)

The primary responsibilities of the Facility Emergency Coordinator in the event of a spill will be the following:

1. Confirm that the source of the spill is closed
2. Confirm that the spill is contained and isolate it from stormwater
3. Determine the volume and location of the spill
4. Determine company and regulatory reporting requirements
   - If any product is discharged into the sanitary sewer drains, MCES will be immediately notified
   - If any product enters any navigable waterway or tributary, the National Response Center and the Minnesota Duty Officer will be immediately notified
5. Direct and complete the cleanup of the spill and dispose of the spill materials

Indoor Site-Specific Spills

Spills will drain towards the sump system inside the respective building.

Small spills, those not exceeding the volume of the sumps, can be retrieved by using the sump pump, or other portable pumps, and transferred to a 55-gallon drum.

In the event of a large spill, all electric circuits shall be turned off to prevent potential fires. Outside contractors as needed should be contacted to remove the spilled . Appendix A lists the potential outside contractors needed.

Small leaks from leaking pipes, valves, sight glasses and filters shall be repaired as soon as detected. Use protective clothing during all phases of clean-up, including boots,

gloves, trousers and goggles. Table 4.1 lists the locations and typed of spill control equipment.

In the event that a drum ruptures, tanker truck(s) from an outside contractor may need to be called in to pump up the liquid. Appendix B provides documentation of the pre-arranged agreement for these companies to respond to a large spill.

Outdoor Site-Specific Spills

The worst case hazardous waste discharge for the BLP Facility would be the loss of the entire contents of a 55-gallon drum in the Wood Treatment Building or Water Treatment Building. In each of these cases, simultaneous failure of the secondary containment structure would have to occur. Review of surface water runoff patterns, Figure 4.1 indicates that liquid from these areas would flow in one of two directions: either east toward Ponds #1 or #2; or northwest toward the stormwater drain. In each case, flow would then reach Pond #3 in the northern most portion of the property and overflow into the storm system and discharge to Hansen Creek.

BLP owns and operates heavy equipment that is capable of moving earth in order to contain an outside spill and to recover, to the maximum extent possible, with the use of a vacuum tanker. If the spill is large and spreading, earth or wood chips (available on site from the Shaver Building) may be used to berm an area to control and contain the spill. Once free liquid has been recovered, use absorbent pads to mop up remaining free residue. Lastly, remove contaminated soil and wood chips and place in 55-gallon steel drums, other containers or stock pile with appropriate liner material. Affix hazardous waste labels to the drums and record the date on the label. Record in the log book the amount of hazardous waste recovered and the amount of contaminated debris recovered.

Three retention ponds exist on site as shown on Figure 4.1. Stormwater inlets located along the northern boarders of the property feed into retention pond #3 at the northern most portion of the Facility. The retention pond is equipped with a oil separation structure prior to discharge into the city sewer system.

In the event of a discharge, the following information should be relayed to those on the contact list:

- Facility Information: Bell Lumber and Pole Company
  776 1st Street Northwest
  New Brighton, Minnesota 55112
  (651) 270-9760
- Date and time of the discharge
- Type of material discharged
- Estimates of the quantity discharged
- Estimates of the quantity discharged into or upon the navigable waters of the United States, adjoining shorelines, or waters contiguous with navigable waters of the United States, including any quantity discharged to groundwater if the groundwater is contiguous with navigable waters of the United States (i.e., groundwater discharges to/contributes to the total volume of a surface water body that is itself contiguous with navigable waters of the United States)
- Source of the discharge
- Description of all affected media
- Cause of the discharge
- Damages or injuries
- Actions being used to stop, remove, and mitigate the effects of the discharge
- Whether an evacuation is needed
- Names of individuals and organizations that have been contacted

Incidental Drippage in StorageYard

In accordance with 40 CFR Parts 264/265, Subpart W, BLP employees will immediately (within 24 hours of identification) cleanup incidental and infrequent drippage from treated utility poles in the storage yard. The cleanup shall be conducted by trained personnel using shovels and/or oil adsorbent pads to a visually clean (no oil stain present) condition. All contaminated media (soil, wood chips, oil adsorbent pads, PPE) will be placed in a DOT-approved 55 gallon drum and managed as a hazardous waste. The drum will be moved to the hazardous waste storage area inside the Pole Treating Building (See Figure 3.1) and labeled appropriately.

All drippage from treated utility pole areas will be documented on the form provided in Appendix E. Completed forms will be returned to the main office and kept on file for a period on not less than 3 years.

Soils beneath freshly treated wood storage piles will be visually inspected at a minimum every three days.

5.0 ARRANGEMENTS WITH LOCAL EMERGENCY RESPONSE SERVICES

BLP has provided copies of the Contingency Plan to the City of New Brighton Police and Fire Departments and to the nearest emergency hospital (Unity Medical Center). Appendix C provides the cover letters of this Contingency Plan sent to these entities.

In the event of a major incident, external resources (contractors) have been identified to assist facility personnel. To ensure the commitment of these external resources, BLP has Belair and Determan Brownie, Inc. as approved vendors. These contractors have the capabilities to provide emergency response, industrial power vacuuming, building decontamination, excavation/earthmoving, and waste transportation and disposal services. Appendix B provides documentation of the pre-arranged agreement for these companies to respond to a large spill.

6.0 RELEASE PREVENTION MEASURES

Secondary containment structures provide all indoor hazardous waste storage areas with sufficient discharge control to prevent the contents of the largest tank from reaching the outside of the building and potentially causing a *discharge*.

There are no building floor drains in operation or hazardous waste storage areas. Three retention ponds with a total storage capacity of approximately 71,000 gallons exist on site as shown on Figure 4.1. Stormwater inlets located along the northern borders of the property feed into retention pond #3 at the northern most portion of the Facility (approximate capacity: 45,000 gallons). The retention pond is equipped with an oil separation structure prior to discharge into the city stormwater sewer system.

Discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers); discharge or drainage controls such as secondary containment; procedures for control of discharge; and countermeasures for discharge discovery, response, and cleanup are discussed below. BLP is committed to protecting the environment from oil spills and/or releases as evidenced by the engineered barriers and spill containment equipment.

BLP relies on a number of measures to aide in the prevention of a discharge. The following practices have been implemented in order to reduce the potential for discharge.

- Routine maintenance and inspection is performed by trained personnel on storage tanks, valves, pumps, piping, sumps, secondary containment structures and/or drip-pans as warranted
- Routine inventory of sorbent materials
- Waste materials are immediately transferred to the used oil drums established in designated areas of the Wood Treatment Building and are properly disposed
- Routine maintenance and inspection of storm water ponds
- Good housekeeping practices are designed to maintain a clear and orderly facility, which will reduce the potential for oil to come into contact with storm water, soils, or groundwater

Inspections are performed according to pre-determined schedules based on engineering knowledge and operational experience depending on system equipment and processes. Each inspection item has the content and frequency necessary to alert facility personnel prior to the development of a release. The Emergency Coordinator and/or his designee

will evaluate and assess each item indicating a potential deficiency, malfunction, equipment deterioration, or operator error through regular observation of the processes and procedures. The level of response and its timing is determined by the nature and severity of the problem identified with the protection of personnel and the prevention of adverse environmental impact being a paramount concern.

Hazardous Waste Training

The Facility Manager/Emergency Coordinator (Section 2.0) is responsible for the coordination of facility employee training with respect to this Contingency Plan and is also the designated person in charge of discharge prevention. At a minimum, training is conducted annually or when new spill regulations are promulgated, existing operating systems are modified, personnel responsibilities change, or the Contingency Plan is amended. All employees are required to have spill prevention training, which includes a complete review of the BLP Facility Contingency Plan and Hazard Communication. Training includes operation and maintenance of equipment discharge prevention, loading and unloading procedures, discharge procedure protocols, and applicable pollution control laws, rules, and regulations. Spill response refresher training is conducted annually on what to do in case of a spill, where the cleanup material and equipment is located, items that make up a complete spill kit, and discharge prevention. Training acknowledgement forms (Appendix D), training summaries, and other training records will be maintained by the Emergency Coordinator for a period not less than three years.

Facility management shall schedule and conduct spill prevention briefings as needed for operating personnel at intervals more frequent than the annual training to ensure adequate understanding of this Contingency Plan. Additionally, personnel roles and responsibilities in the event of a spill are outlined in Table 4.2.

Inspections

As part of day-to-day operations, operators visually inspect the exterior of the hazardous waste storage containers for signs of deterioration or leaks. Qualified facility personnel perform, at a minimum, weekly inspections of all hazardous waste storage containers and secondary containment areas at BLP for signs of deterioration or leaks. Any deficiencies noted during these inspections will be documented and corrected in a timely manner. All records of inspections will be kept on file at the BLP Facility for a period of not less than three years. Records of inspections and tests under usual and customary business practices will suffice.

Visible oil leaks will be reported on the Inspection Forms (Appendix E) and to the Facility Manager and repaired immediately. Any hazardous waste that is spill or leaked

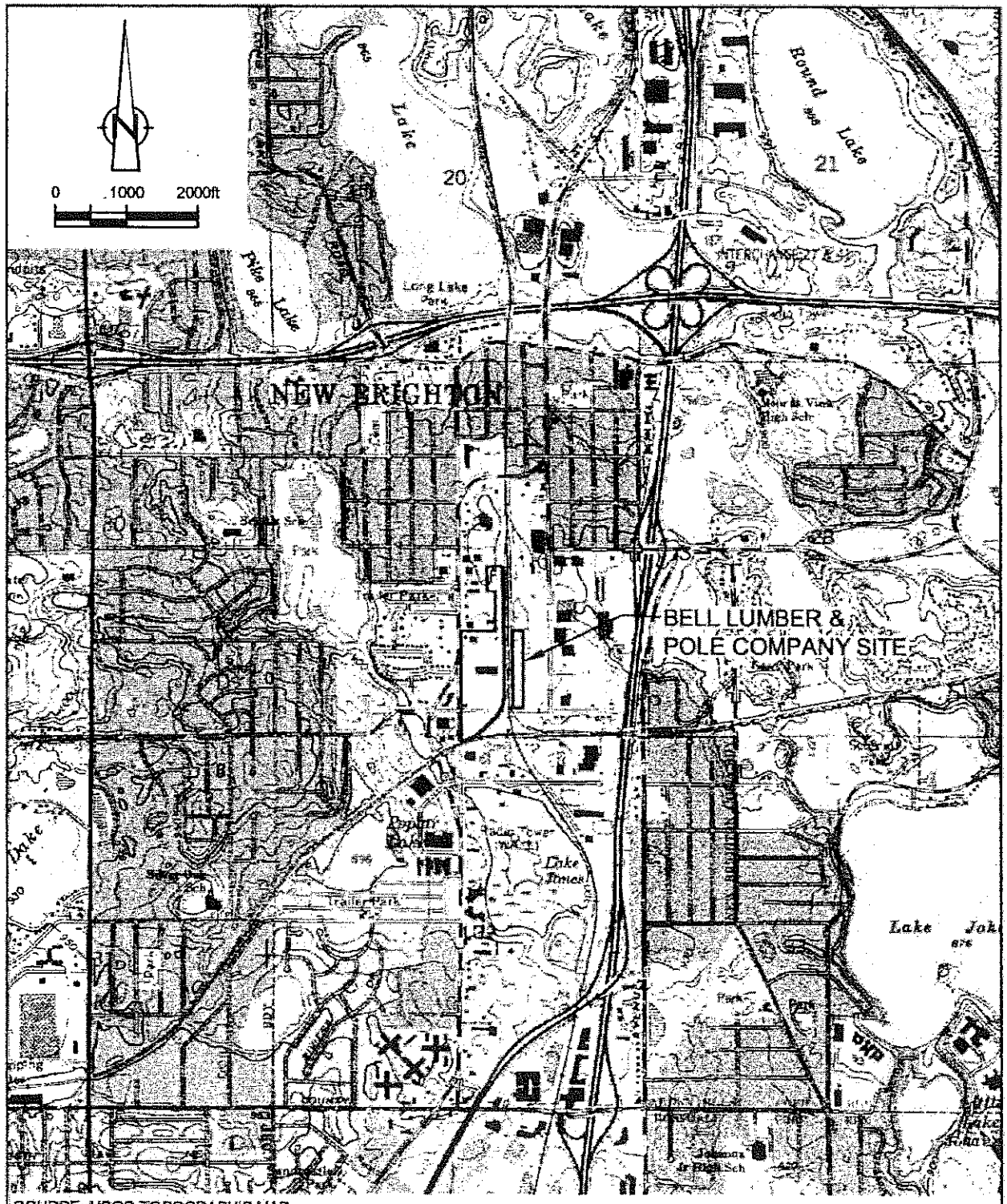
is cleaned up immediately using the cleanup supplies are located in the Wood Treatment and Water Treatment Buildings and is disposed of as required.

7.0 EMERGENCY EQUIPMENT

In the event of a release, the Facility has trained personnel and equipment available to contain and clean-up minor volumes of hazardous waste. On-site equipment and materials include floor dry, rakes, shovels, sump pumps, wood shavings, front-end loader in bucket, etc., that may be used to dike, contain, and remove minor releases. A summary of the location and quantity of various spill control equipment at the Facility is summarized in Table 4.2.

8.0 EVACUATION PLAN

In accordance with Minnesota Rules 7045.0572(4)(F), an evacuation plan must be included in the Contingency Plan where there is a possibility that evacuation could be necessary. BLP has an Emergency Action Plan in place that meets the Minnesota requirements. The Emergency Action Plan is provided in Appendix F. Evaluation Routes for the Wood Treatment Building and the Water Treatment Building are shown on Figures 3.1 and 3.2 respectively.



SOURCE: USGS TOPOGRAPHIC MAP
NEW BRIGHTON, MINNESOTA.

figure 1.1

SITE LOCATION

Bell Lumber & Pole Co.

005480-40(038)GN-GB001 AUG 27/2010

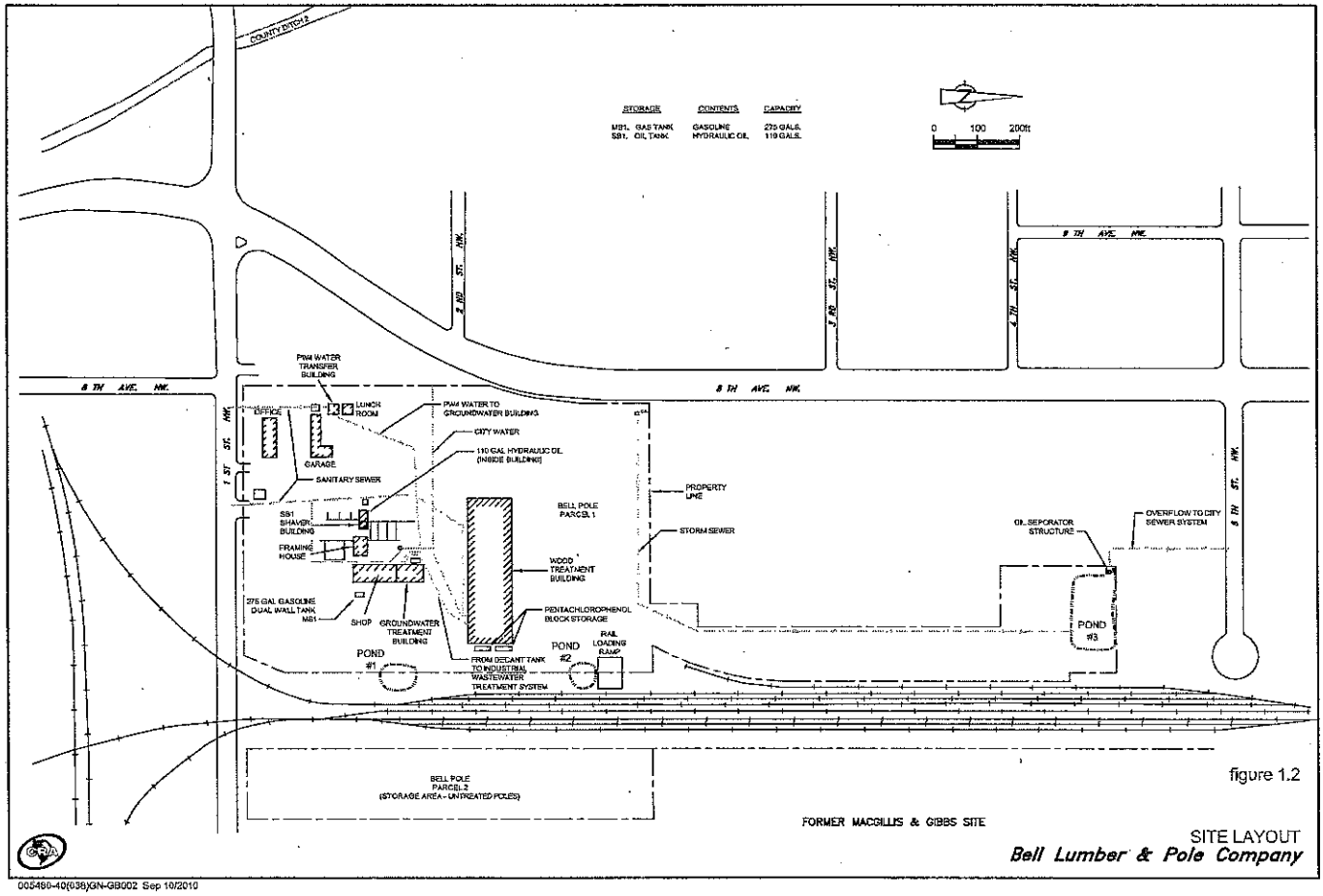


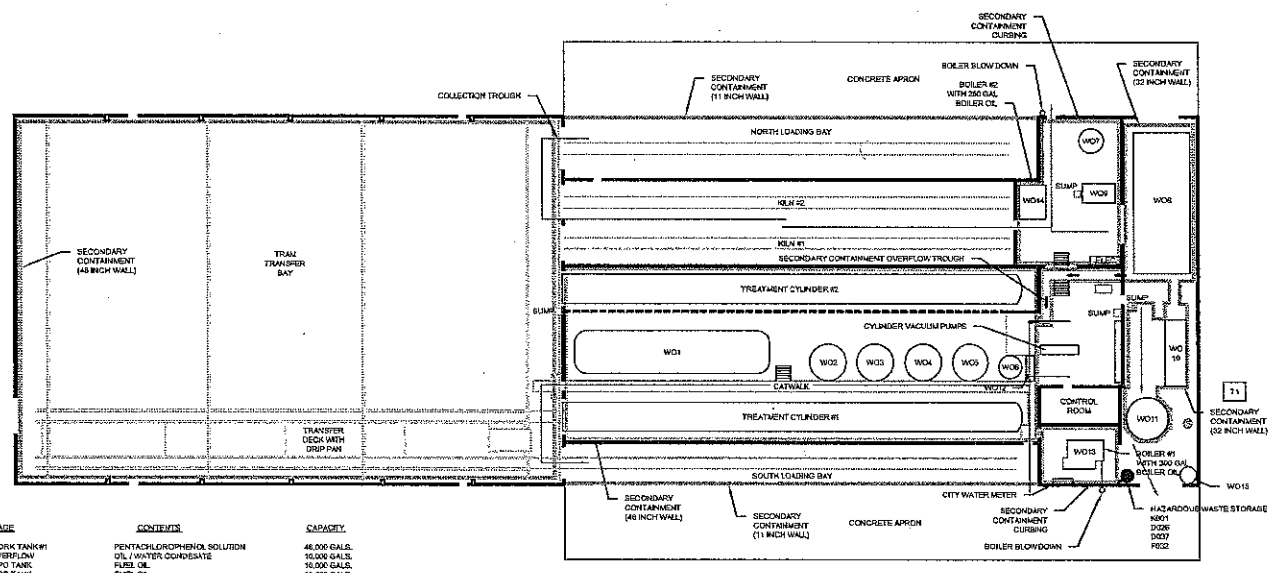
figure 1.2

FORMER MACGILLIS & GIBBS SITE

SITE LAYOUT

Bell Lumber & Pole Company

005480-40(036)GN-GB002 Sep 10/2010



STORAGE	CONTENTS	CAPACITY
WO1. WORK TANK #1	PENTACHLOROPHENOL SOLUTION	46,000 GALS.
WO2. OVERFLOW	OIL / WATER CONDESATE	10,000 GALS.
WO3. WPO TANK	FUEL OIL	10,000 GALS.
WO4. WPO TANK	FUEL OIL	10,000 GALS.
WO5. LIQUID PENTA STORAGE TANK	PENTACHLOROPHENOL SOLUTION	10,000 GALS.
WO6. CONDENSATION TANK		2,900 GALS.
WO7. DEGANIT TANK	WATER AND LIGHT OILS	5,300 GALS.
WO8. WORK TANK #2	PENTACHLOROPHENOL SOLUTION	46,000 GALS.
WO9. CHILLER UNIT	GYLCOL	1,300 GALS.
WO10. BLOCK DISSOLVER TANK	PENTACHLOROPHENOL - SOLID FORM	4,275 GALS.
WO11. MIX STORAGE	PROPESSEL	10,000 GALS.
WO12. VACUUM PUMP TANK	FUEL OIL	800 GALS.
WO13. BOILER #1	BOILER OIL	300 GALS.
WO14. BOILER #2	BOILER OIL	250 GALS.
WO15. DRUM	COPPER NAPTHANATE	55 GALS.
T1. TRANSFORMER, PAD MOUNTED	TRANSFORMER OIL	200 GALS.

figure 3.1

FLOOR PLAN
WOOD TREATMENT BUILDING
Bell Lumber & Pole Company

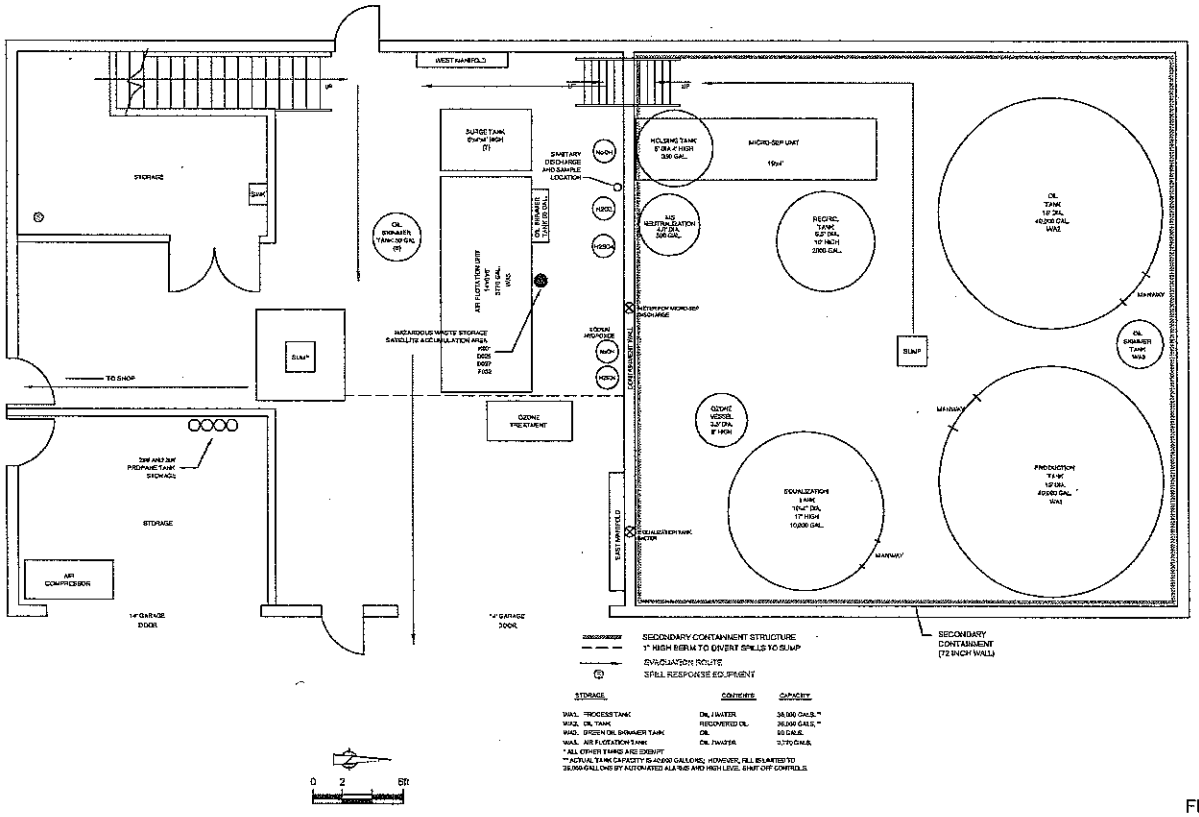


figure 3.2

FLOOR PLAN
WATER TREATMENT BUILDING
Bell Lumber & Pole Company

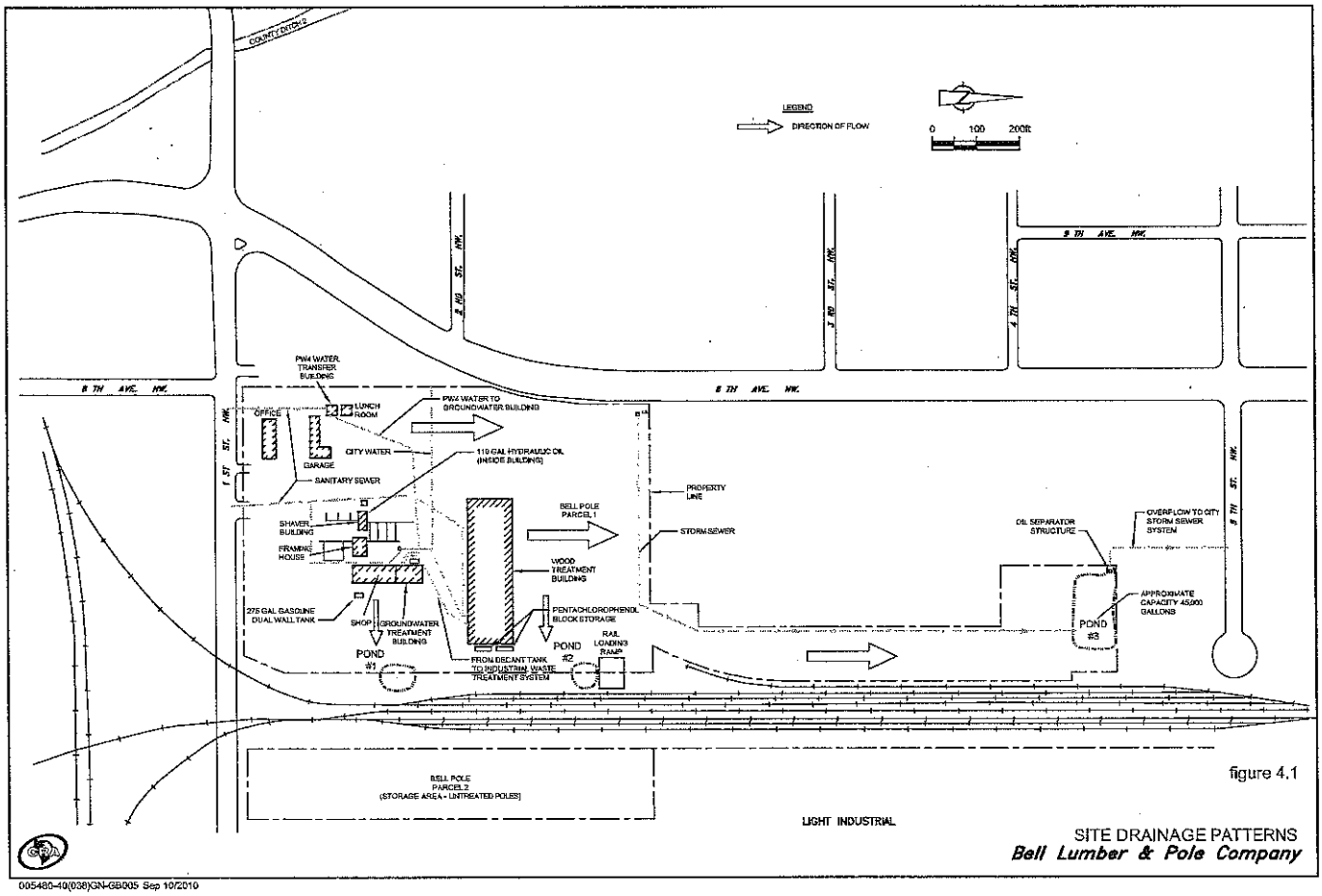


figure 4.1

SITE DRAINAGE PATTERNS
Bell Lumber & Pole Company

TABLE 4.1

SPILL CONTROL EQUIPMENT AND LOCATION
BELL LUMBER AND POLE COMPANY
NEW BRIGHTON, MINNESOTA

Type of Spill Control Equipment	*Location of Spill Control Equipment*
Wood shavings	Shavings Building (storage hopper)
1,000-gallon mobile tank with electric motor	Parking lot near former Water Treatment Building
Commercial sorbent pads	Wood Treatment Building (former penta block storage area)
	Water Treatment Building (laboratory/storage area)
Retrieval pumps and hose	Wood Treatment Building (storage bay)
Face mask, respirator, protective clothing (coveralls, gloves, boots)	Wood Treatment Building (control room)
	Water Treatment Building (laboratory/storage area)
Fire extinguisher	Wood Treatment Building (storage bay)
	Water Treatment Building (laboratory/storage area)
Sump pumps	Wood Treatment Building (storage bay)
Rakes, shovels, pitch fork	Wood Treatment Building (storage bay)
Floor dry	Wood Treatment Building (storage bay)
	Water Treatment Building (laboratory/storage area)

TABLE 4.2

SPILL AND EMERGENCY RESPONSE
ROLES AND RESPONSIBILITIES
BELL LUMBER & POLE COMPANY
NEW BRIGHTON, MINNESOTA

Title	*General Description*	*Specific Duties*
Senior Management	Determines response and planning objectives, allocates resources, determines chain of command and evaluates response performance.	- provides the necessary facilities, equipment and financial support - provides adequate personnel and time resources - prepares all statements for release to news media and public
Emergency Response Coordinator	Reports to senior management. Has authority to direct response operations. Assumes total control over site activities.	- prepares and organizes the background review of the situation, the work plan and the field teams - determines if situation is Major Emergency - a Major Emergency is defined as one that has affected or has the potential to affect persons or property outside of Bell Pole site - briefs field teams on specific assignments - prepares final report and support files on response activities - serves as liaison with public officials (Police, Fire Department) - ensure site security - determines need for external resources
Emergency Response Team	Team is involved in field activities as directed by Emergency Response Coordinator.	- safely complete on-site tasks - complies with site safety plan
Rescue Team	Used to remove injured personnel from emergency area.	- provide first aid - assist ambulance attendants, if required
Communications Officer	Responsible for communications and emergency assistance. Also acts as record keeper.	- makes all necessary outside phone calls - maintains a log of communication and site activities - maintains communication contact with work parties as required
External Resources	Provide assistance as required.	- police - fire department - contractors
Staging Area Coordinator	Responsible for coordinating all activities in the staging area.	- completes a head count of all personnel in the staging area and determines if anyone is missing - reports results of head count to ERC - assembles field teams as directed by ERC - assigns site security - directs emergency response vehicles upon arrival at the site

APPENDIX A

EMERGENCY CONTACT LIST

APPENDIX A
EMERGENCY CONTACTS

Rick Bleskey Primary Emergency Response Coordinator		(651) 203-2705
Brian Hamilton Yard Foreman/Alternate Emergency Response Coordinator		(651) 633-4335
Brian Stepaniak Quality Control Safety Coordinator/ Alternate Emergency Response Coordinator		(651) 470-5008
Thomas Bell President		(651) 426-3808
Craig Hiljus Foreman		(612) 801-0151
Steve Kracht Sales Manager		(651) 783-7267
Tony Mackin Groundwater Treatment Building		(651) 633-5461
Gary Chambers Wood Treatment Building		(651) 429-6776
Dispatcher	Metro Spill Response	(651) 649-5451
Fire Emergency		911
New Brighton Fire Department	Non-emergency	(651) 638-2160
Police		911
National Response Center		(800) 424-8802
Local Doctor Clinic (Columbia Park Medical Center) 4000 Central Avenue, Columbia Heights		(763) 572-5710
Local Hospital (Unity Medical Center) 550 Osborne Road, Fridley		(763) 780-6844
Xcel Energy - Electric	Emergency	(800) 895-1999
Xcel Energy - Gas	Emergency	(800) 895-2999

OUTSIDE CONTRACTORS

Muska Electric	Terry Artman	(651) 636-5820
Naseff Plumbing	Mickey Naseff	(651) 777-0001
Belair Builders Hazmat, General	Mark Muriowski	(651) 786-1300
Determan Brownie, Inc. Hazmat, General	Bob Chency	Work: (763) 502-9648 Home: (Non-releasble Cell: (
Supreme Lines	Arien	Day Time: (Night Time: (

APPENDIX B

PRE-ARRANGEMENT FOR SPILL CONTROL MEASURES

Bell LUMBER & POLE
SINCE 1909
Stewardship ♦ Excellence
Entrepreneurial Spirit

778 – 1st Street NW
P.O. Box 120786
New Brighton, MN
55112-0024

Phone: 651-633-4334
Fax: 651-633-8852

October 20th, 2010

Mr. Bob Cheney
DETERMAN-BROWNIE, INC.
1241 72nd Avenue N.E.
Fridley, Minnesota 55432

Re: Prearrangement for Spill Control Measures
Bell Lumber & Pole Company, New Brighton, Minnesota

In order to comply with State of Minnesota requirements for spill prevention measures, Bell Lumber & Pole Company needs proof of prearranged third party services and equipment to respond to a potential spill at the New Brighton, Minnesota facility. In the case of a spill, Bell Lumber & Pole requests your company's assurance to supply manpower, tankage, and equipment to contain or clean up a spill of wood treating oil within 24 hours of notification. This oil contains a 7 percent mixture of pentachlorophenol (PCP) in No. 2 fuel oil. Material safety and data sheets for the oil and PCP are attached.

Please acknowledge agreement by signing in the space below, that your company will be able to provide this service to Bell Lumber & Pole.

Sincerely,

BELL LUMBER & POLE COMPANY

Rick Bleskey
Midwest Operations Coordinator

Enclosure

Determan-Brownie, Inc. agrees to provide emergency spill response to Bell Lumber & Pole Company at its New Brighton, Minnesota facility as per the SPCC Plan developed for the Site.

Bob Cheney
Determan-Brownie, Inc.

10-25-10
Date

Bell LUMBER & POLE
SINCE 1909
STEWARDSHIP ♦ EXCELLENCE
ENTREPRENEURIAL SPIRIT

778 – 1st Street NW
P.O. Box 120786
New Brighton, MN
55112-0024

Phone: 651-633-4334
Fax: 651-633-8852

September 28, 2010

Mr. Mark Murlowski
BELAIR BUILDERS
2200 Old Highway 8 N.W.
St. Paul, Minnesota 55112

Re: Prearrangement for Spill Control Measures
Bell Lumber & Pole Company, New Brighton, Minnesota

In order to comply with State of Minnesota requirements for spill prevention measures, Bell Lumber & Pole Company needs proof of prearranged third party services and equipment to respond to a potential spill at the New Brighton, Minnesota facility. In the case of a spill, Bell Lumber & Pole requests your company's assurance to supply manpower, tankage, and equipment to contain or clean up a spill of wood treating oil within 24 hours of notification. This oil contains a 7 percent mixture of pentachlorophenol (PCP) in No. 2 fuel oil. Material safety and data sheets for the oil and PCP are attached.

Please acknowledge agreement by signing in the space below that your company will be able to provide this service to Bell Lumber & Pole.

Sincerely,

BELL LUMBER AND POLE COMPANY

Rick Bleskey
Midwest Operations Coordinator

Enclosure

Belair Builders agrees to provide emergency spill response to Bell Lumber & Pole Company at its New Brighton, Minnesota facility as per the SPCC Plan developed for the Site.

Mark D Murlowski, CEO
Belair Builders Inc.

22 Oct 2010
Date

APPENDIX C

CONTINGENCY PLAN COVER LETTERS

Bell LUMBER & POLE
SINCE 1909
STEWARDSHIP ♦ EXCELLENCE
ENTREPRENEURIAL SPIRIT

778 – 1st Street NW
P.O. Box 120786
New Brighton, MN
55112-0024

Phone: 651-633-4334
Fax: 651-633-8852

November 8, 2010

Mr. Dan Olson
NEW BRIGHTON FIRE DEPARTMENT
785 Old Highway 8 NW
New Brighton, MN 55112

Dear Mr. Olson:

Re: Hazardous Waste Contingency Plan
Bell Lumber & Pole Company

Please find enclosed the Hazardous Waste Contingency Plan for Bell Lumber & Pole Company located at 778 First Street Northwest, New Brighton, Minnesota. The purpose of this plan is to prepare your department in the event of a release of potentially hazardous materials at the facility.

Please call me if you have any questions

Sincerely,

BELL LUMBER & POLE COMPANY

Rick Bleskey
Midwest Operations Coordinator

Enclosure

cc: New Brighton Police Department
Ellen Fastner, Unity Hospital

APPENDIX D

SPILL PREVENTION AND RESPONSE TRAINING

AGENDA

ANNUAL TRAINING
2010

- REQUIREMENTS OF THE TRAINING (i.e. hazard notification-chemical, physical, and noise)
- MSDS REVIEW - UPDATE BINDER
- REVIEW OF SPILL RESPONSE PLANS (includes inspection forms and emergency equipment)
  - SPCC
  - SWPPP
  - HAZARDOUS WASTE CONTINGENCY PLAN (includes Hazardous Waste Management and Inspection Procedures)
  - EMERGENCY ACTION PLAN
- REVIEW OF HEALTH AND ENVIRONMENTAL POLICY STATEMENT
- REPORT SCHEDULE
- REVIEW OF PENTACHLOROPHENOL CONSUMER INFORMATION SHEET

APPENDIX E

FACILITY INSPECTION FORMS

FORM 1

DAILY
INSPECTION OF TANKS, PIPES, VALVES, TREATING CYLINDER AND TREATED WOOD STORAGE AREA FOR LEAKS AND DRIPPAGE

THIS FORM IS USED FOR SPCC, NPDES, & SWPPP REQUIREMENTS

Inspection Date:_____ Bell Pole Inspector:_____

ITEM	CHECK IF OK	ITEM	CHECK IF OK
Cylinder #1 Door	_____	Cylinder Door Fail Safe Light (#1 & #2)	_____
Cylinder #2 Door	_____	Sight Glasses	_____
Heat Exchanger #1	_____	Heat Exchanger #2	_____
Filter Press	_____		
Temperature Controls	_____		

PUMPS

#1 Transfer	_____	Scrubber	_____
Decant Tank	_____	#2 Transfer	_____
Large Circulation	_____	Condensate	_____
#1 Vacuum Pump	_____	Small Circulation	_____
#2 Vacuum Pump	_____		

VALVES

#101___	#102___	#103___	#104___	#107___	#108___	#109___	#110___
#111___	#112___	#114___	#115___	#116___	#118___	#119___	#201___
#202___	#203___	#204___	#205___	#206___	#207___	#208___	#209___
#211___	#214___	#216___	#218___	#219___	Filter Inlet___	Filter Outlet___	

Drain Valve___ Truck Unload___

BLOCK DISOLVER AREA

Valves	_____	Piping	_____
Pump #1	_____	Pump #2	_____

CYLINDER DOOR SUMP

Date Cleaned:_____ Amount of Material Removed to Hazardous Waste Storage_____gallons

Note any repairs, action taken on leaks, or any other additional comments here. Use backside if more space is necessary.

Outside Treated Wood Storage Areas: Check daily for Drippage. Remove any Stained Soil to Hazardous Waste Drum Storage.

Drippage noted? Yes No If yes, record amount of soil recovered_____gallons. Comments:
Warning Label for Treated Wood Storage in Place? Yes No

SUBMIT THIS INSPECTION FORM EACH DAY TO QUALITY CONTROL SAFETY COODINATOR

FORM 1-A

WATER TREATMENT BUILDING
WEEKLY INSPECTION LOG

BELL LUMBER & POLE COMPANY
(for SPCC and RCRA Requirements)

Inspection Date:_____ Bell Pole Inspector:_____

ITEM	CHECK IF OK	REPAIRS/COMMENTS
Tankage (Leaks, Level Sensors)		
Process Tank	_____	_____
Oil Storage Tank	_____	_____
Equalization Tank	_____	_____
Oil Skimmer Tank	_____	_____
AF Tank	_____	_____
AF Overflow Tank	_____	_____
Neutralization Tank	_____	_____
Ozone Contact Tank	_____	_____
Sump 1	_____	_____
Sump 2	_____	_____
Air Floatation Unit	_____	_____
Ozone Unit	Oxygen Feed	_____
Oxygen Pressure:	_____	
Ozone Setting	_____	
Ozone Pressure	_____	
Ozone Flow	_____	
Chiller Temperature	_____	
Chiller Fluid Level	_____	
Pumps (leaks, Auto Shut Off)		
Pump 1	_____	_____
Pump 2	_____	_____
Pump 17	_____	_____
Pump 18	_____	_____
Pump 20	_____	_____
Pump 25	_____	_____
Pump 32	_____	_____
Pipes, Valve, Fittings	_____	_____
Floor (Cracks, Sealant Gaps)	_____	_____
PW4 Transfer Tank	_____	_____
Pumps		
Values and Fittings	_____	_____

FORM 2

WEEKLY INSPECTION OF YARD DRAINAGE DITCHES, RETENTION POND, AND SWALES FOR DEBRIS AND CONTAMINATION

THIS FORM IS USED FOR SWPPP REQUIREMENTS

Inspection Date:_____ Bell Pole Inspector:_____

Significant Rainfall Event? Yes No

Check Drainage Ditches, Swales (low spots in yard), and Retention Pond for Presence of Floating Debris, Excessive Sedimentation, and Visible Signs of Contamination.

The above must also be checked after a SIGNIFICANT RAINFALL EVENT. A Significant Event is one that causes an overland flow or surface flow of water.

Record Results of Inspection and Actions Taken. Use backside of form if necessary.

Location	*Observation*
East Side Retention Pond (BML03)	
North End Retention Pond (BML01)	
East End of East Yard (BML05)	
West End of East Yard (BML06)	
South West end of South Yard (BML04)	
South End of Main Yard (BML02)	
Office Parking Lot Catch Basin	
Main Yard Driveway Catch Basin	

SUBMIT THIS INSPECTION FORM EACH WEEK TO QUALITY CONTROL SAFETY COODINATOR

FORM 3

WEEKLY INSPECTION
OF
HAZARDOUS WASTE STORAGE AREAS
AND
HAZARDOUS WASTE STORAGE CONTAINERS

THIS FORM IS USED FOR RCRA (Resource Conservation and Recovery Act) REQUIREMENTS

Inspection Date:_____ Bell Pole Inspector:_____

STORAGE OF HAZARDOUS WASTE IN WOOD TREATMENT BUILDING

1. Keep hazardous waste containers closed, except to add or remove waste. Drum lids must be secured and the ring bolted tight.

2. Maintain adequate aisle space to ensure unobstructed removed of personnel, and fire and spill equipment. Labels must be clearly visible.

3. Restrict access to the storage site to prevent accidental damage from equipment.

SATELLITE ACCUMULATION-CROW/MAINTENANCE BUILDING

1. Waste must be stored at or near the point of generation.

2. Waste accumulation is limited to 55 gallons.

3. Date is marked on the container when filled.

4. Waste is moved to permanent storage within 3 days of fill date.

5. Waste is under direct control of process supervisor.

MARKING AND LABELING CONTAINERS

1. Mark the containers with the words **HAZARDOUS WASTE**.

2. Mark the container with a clear description of the waste.

3. Mark the container with the accumulation start date. The accumulation start date for very small quantity generators (VSQG) is the date that the 1000 kg (about 4 drums) limit is reached.

4. A VSQG generates less than 100 kg of waste per month (about 220 pounds or 22 gallons).

USE LOG BOOK LOCATED IN PLANT MANAGERS OFFICE TO RECORD WEEKLY INSPECTIONS. INSPECTIONS SHOULD CONFORM TO ABOVE.

5. A SQG generate between 1-- and 1000Kg of waste per month.

6. A LQG generates 1000Kg of waster or more per month.

SHIPPING HAZARDOUS WASTE

1. All hazardous waste shipments require a DOT Hazard Label (4X4). Check with either DOT or the hazardous waste shipper on proper type and number of labels required.

2. All hazardous waste shipments require a DOT ID number.

3. All hazardous waste shipments require a company name and address, EPA ID number, manifest document number, accumulation start date, and the words: "**HAZARDOUS WASTE-FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.**"

USE LOG BOOK LOCATED IN PLANT MANAGERS OFFICE TO RECORD WEEKLY INSPECTIONS. INSPECTIONS SHOULD CONFORM TO ABOVE.

FORM 4

WEEKLY
INSPECTION OF DRIP PAD
HAZARDOUS WASTE STORAGE AREAS
AND
WASH DOWN COLLECTION TRENCH AND SUMP

THIS FORM IS USED FOR RCRA (Resource Conservation and Recovery Act) REQUIREMENTS

Inspection Date:_____ Bell Pole Inspector:_____

Federal and state regulations under RCRA (Resource Conservation and Recovery Act) require weekly inspection of the drip pad, and cleaning as required. The rule states: "**Cleaning of drip pads is required in a manner and frequency to be determined on a facility-specified basis by the owner/operator to allow weekly inspection of the entire surface of the drip pad.**" In addition, "**Owners and operators must document, in the facility's operating record, the date, time, and quantity of leakage collection when it is removed from the collection device.**" The collection device here is the underlying concrete floor.

The drip pad consists of a solid steel transfer table. Although it is not anticipated that the steel transfer table will ever leak, inspections nevertheless, need to be made of both the transfer deck and the underlying concrete.

The wash down collection trench and sump system, also, require weekly inspection for leaks and proper operation.

As part of this inspection report, the north and south loading bays, and the interior storage bays will be inspected for cleanliness, integrity, and drippage.

	CHECK IF OK	AREAS NEEDING ATTENTION
TRANSFER DECK	_____	_____
TRANSFER BAY FLOOR	_____	_____
TRANSFER BAY TRENCH	_____	_____
TRANSFER BAY SUMP PUMP	_____	_____
SOUTH LOAD/UNLOAD BAY	_____	_____
NORTH LOAD/UNLOAD BAY	_____	_____
HAZ WASTE STORAGE AREA	_____	_____

SUBMIT THIS INSPECTION FORM EACH WEEK TO QUALITY CONTROL SAFETY COORDINATOR

FORM 5

DRIP TIME REQUIREMENT FOR FRESHLY TREATED WOOD ON DRIP PAD

THIS FORM IS USED FOR RCRA (Resource Conservation and Recovery Act) REQUIREMENTS

Federal and state regulations under RCRA (Resource Conservation and Recovery Act) require that freshly treated wood remain on the drip pad until all drippage has ceased. Records must be kept documenting this requirement

CHARGE NUMBER	TIME ON PAD HRS	TIME ON PAD MINUTES	TIME UNLOADED FROM CYLINDER	DATE	OPERATOR
				/ /	
				/ /	
				/ /	
				/ /	
				/ /	
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FORM 6

WEEKLY
INSPECTION LOG
BELL LUMBER & POLE COMPANY
THIS FORM USED FOR SPCC AND SWPPP REQUIREMENTS

Inspection Date:_____ Bell Pole Inspector:_____

ITEM	*CHECK IF OK*	*REPAIRS/COMMENTS*
WATER TREATMENT BUILDING		
Tankage (Leaks, Level Sensors)		
Process Tank	_____	_____
Oil Storage Tank	_____	_____
Equalization Tank	_____	_____
Oil Skimmer Tank	_____	_____
AF Skimmer Tank	_____	_____
AF Surge Tank	_____	_____
Neutralization Tank	_____	_____
Sump 1	_____	_____
Sump 2	_____	_____
Air Floatation Unit	_____	_____
Ozone Unit	_____	_____
Pumps (leaks, Auto Shut Off)		
Pump 1	_____	_____
Pump 2	_____	_____
Pump 17	_____	_____
Pump 18	_____	_____
Pump 20	_____	_____
Pump 25	_____	_____
Pump 32	_____	_____
Pipes, Valve, Fittings	_____	_____
Floor (Cracks, Sealant Gaps)	_____	_____
PW4 Transfer Tank	_____	_____
Microsept Pumps, Values and Fittings	_____	_____
INDUSTRIAL EQUIPMENT (PREVENTATIVE MAINTENANCE		
Pettibone Hydraulic System	_____	_____
TRANSFORMERS		
Wood Treatment Bldg.	_____	_____

ITEM	CHECK IF OK	REPAIRS/COMMENTS
MAINTENANCE SHOP		
MS1 Gas Tank		
MS2 Diesel Tank		
MS3 Transmission Fluid Tank		
MS4 Used Oil Tank		
MS5 Motor Oil Tank		
MS6 Motor Oil Tank		
*** Grease Drum		
MS7 Kerosene Drum (2)		
MS8 Hydraulic Oil Drum (2)		
SHAVER BUILDING		
SB1 Hydraulic Oil Tank		
WOOD TREATMENT BUILDING		
WO1 Work Tank #1		
WO2 Overflow Tank		
WO3 WPO Tank #3		
WO4 WPO Tank#4		
WO5 Penta Storage		
WO6 Combination Tank		
WO7 Decant Tank		
WO8 Work Tank #2		
WO9 Chiller Unit		
WO10 Block Dissolver		
WO11 Mix Storage		
WO12 Vacuum pump tank		
WO13 Boiler #1		
WO14 Boiler #2		
WO15 Drum		
T1** Transformer (pad mounted)		

FORM 7

Documentation of Cleanup from Incidental Preservative Drippage

In accordance with 40 CFR Parts 264/265, Subpart W, BLP employees will immediately (within 24 hours of identification) cleanup incidental and infrequent drippage from treated utility poles in the storage yard. The cleanup shall be conducted by trained personnel using shovels and/or oil adsorbent pads to a visually clean (no oil stain present) condition. All contaminated media (soil, wood chips, oil adsorbent pads, PPE) will be placed in a DOT-approved 55 gallon drum and managed as a hazardous waste. The drum will be moved to the hazardous waste storage area inside the Pole Treating Building and labeled appropriately.

Return completed form to main office.

Date		*Location of drippage*		*Volume of Removed Material (gallons)*		*Initals*

Weekly Inspection of Hazardous Storage areas and Hazardous Storage Containers.

****This inspection must be done in accordance with the standards in the front of this book and any issues must be written in as well as what was done to correct the issue

2011 Date Inspected	Inspector's initial	# Drums	Issues	What was done to correct the issue
1/3/2011				
1/10/2011				
1/17/2011				
1/24/2011				
1/31/2011				
2/7/2011				
2/14/2011				
2/21/2011				
2/28/2011				
3/7/2011				
3/14/2011				
3/21/2011				
3/28/2011				
4/4/2011				
4/11/2011				
4/18/2011				
4/25/2011				
5/2/2011				
5/9/2011				
5/16/2011				
5/23/2011				
5/30/2011				
6/6/2011				
6/13/2011				
6/20/2011				
6/27/2011				

Weekly Inspection of Hazardous Storage areas and Hazardous Storage Containers.

****This inspection must be done in accordance with the standards in the front of this book and any issues must be written in as well as what was

2011 Date Inspected	Inspector's initial	# Drums	Issues	What was done to correct the issue
7/4/2011				
7/11/2011				
7/18/2011				
7/25/2011				
8/1/2011				
8/8/2011				
8/15/2011				
8/22/2011				
8/29/2011				
9/5/2011				
9/12/2011				
9/19/2011				
9/26/2011				
10/3/2011				
10/10/2011				
10/17/2011				
10/24/2011				
10/31/2011				
11/7/2011				
11/14/2011				
11/21/2011				
11/28/2011				
12/5/2011				
12/12/2011				
12/19/2011				
12/26/2011				

APPENDIX F

EMERGENCY ACTION PLAN

Bell Lumber and Pole Company

New Brighton, MN.

EMERGENCY ACTION PLAN

EMERGENCY ACTION PLAN

1. **PURPOSE:** To establish an evacuation procedure designed to ensure the protection of all employees and visitors located at this facility in the event of an emergency.

2. **SCOPE:** This plan applies to all personnel within this facility's area in the event of an emergency.

3. **POLICY:** It is this company's policy to comply with the regulations and where feasible, go beyond the regulations to ensure the safety and health of all employees in the event of an emergency.

4. **PERSONNEL INVOLVED:** Personnel involved in the Evacuation Action Plan (EAP) are as follows:

Manage Evacuation Plan:	*Rick Bleskey*	**Emergency Assistance Notification:**	*Rick Bleskey, Craig Hilgus, Brian Hamilton*
Oversee Evacuation of the Treating Plant Location:	*Craig Hilgus, Brian Hamilton*		
Oversee Evacuation of yard area:	*Craig Hilgus, Brian Hamilton*		

5. **PERSONNEL NOTIFICATION OF AN EMERGENCY**

- This plan will be instituted anytime the emergency alarm system goes on, Whether manually or automatically. Below are some (but not all) of the potential emergencies that may occur at this facility.
    - Fire
    - Severe chemical spill or leak
    - Person seen or found unconscious for an unknown reason
- Escape routes
    - Escape routes are posted through out the facility.
- This facility does not have an alarm system. Supervisory personnel in the yard and operations buildings have two-way radios that are linked to the main office. Upon discovery of an emergency site personnel will contact the closest person with a two-way radio who will then contact the main office. The main office will then broadcast the emergency and other applicable information to those with radios who will inform others.

6. **EMERGENCY ESCAPE PROCEDURES**

- The evacuation locations are as follows:
    - The *primary evacuation* meeting location: *Main Office basement*
    - The *secondary evacuation* location, if the emergency is near the vicinity of the primary meeting location will be: Employee breakroom shower area.

6. EMERGENCY ESCAPE PROCEDURES CONT'D

- Emergency shut down procedures are necessary for the following equipment, *only* if it can be performed safely with no potential employee exposure to the emergency:

    - Treating cylinder. If the treating cylinder is running a cycle, then Pumps may need to be shut down, valves closed and pressure Removed from the cylinder prior to evacuation to prevent a spill.

Overseeing of the Evacuation

The personnel listed in *Section 4* will oversee that their areas have been Fully evacuated.

Notification of Emergency Evacuation to Employees

Select employees within each department have radios and notification will be through the radios.

Notification of Emergency to Authorities

The primary receptionist is responsible for bringing the visitor log and internal radio out to the evacuation location.

Senior management officials will determine any outside notifications necessary and/or ensure that these are completed.

7. ACCOUNTING FOR EMPLOYEES AFTER EVACUATION IS COMPLETE

- Rick Bleskey and Craig Hilgus will determine that all visitors have been accounted for.

- Rod will determine that all drivers have been accounted for.

Supervisors and lead personnel will determine that all employees have been accounted for.

8. RESCUE AND MEDICAL DUTIES FOR EMPLOYEES

Employees are not qualified to perform any rescues on personnel located in a potentially hazardous environment due to a spill, leak or fire.

If a rescue is necessary, the fire department will be notified to provide rescue and emergency services.

Several employees have been trained in first aid and CPR procedures. However, it is *not* in any job descriptions that employees must perform first aid duties. Any medical assistance would be voluntary.

9. TRAINING AND DRILLS

Personnel listed in *Section 4* will receive, at a minimum, annual training or refresher training to review their individual roles during an evacuation.

All personnel that work at this facility will receive periodic training to review evacuation locations and escape routes.

Annually, at least one evacuation drill will be performed.

New employees, during their initial training, are informed of the evacuation locations and the procedures for evacuation.

10. EMERGENCY EVACUATION ESCAPE ROUTES

Emergency evacuation escape route maps are posted through out this facility in conspicuous locations. (See attached copy)